

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DONALD J. TRUMP, DONALD J. TRUMP
JR., ERIC TRUMP, IVANKA TRUMP,

and

THE DONALD J. TRUMP REVOCABLE
TRUST, THE TRUMP ORGANIZATION,
INC., TRUMP ORGANIZATION LLC, DJT
HOLDINGS LLC, DJT HOLDINGS
MANAGING MEMBER LLC, TRUMP
ACQUISITION LLC, and TRUMP
ACQUISITION, CORP.,

Plaintiffs,

- against -

DEUTSCHE BANK AG and CAPITAL ONE
FINANCIAL CORP.,

Defendants.

Docket No. 1:19-cv-03826-ER

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' MOTION FOR A
PRELIMINARY INJUNCTION**

After considering Plaintiffs' motion for a preliminary injunction, the parties' briefs, and the evidence and oral argument presented at the preliminary-injunction hearing, Plaintiffs' motion is GRANTED. Plaintiffs have demonstrated “(a) irreparable harm and (b) either (1) likelihood of success on the merits or (2) sufficiently serious questions going to the merits to make them a fair ground for litigation and a balance of hardships tipping decidedly toward the party requesting the preliminary relief.” *Citigroup Glob. Markets, Inc. v. VCG Special Opportunities Master Fund Ltd.*, 598 F.3d 30, 35 (2d Cir. 2010). It is hereby ORDERED that, until this Court adjudicates the merits of Plaintiffs' claims and enters final judgment:

1. The challenged subpoenas are stayed;
2. Defendants Deutsche Bank AG and Capital One Financial Corp. (and their successors in office, officers, agents, servants, employees, attorneys, and anyone acting in concert

with them) are enjoined from disclosing, revealing, delivering, or producing the information requested in the challenged subpoenas, or otherwise taking any action to comply with the challenged subpoenas; and

3. Intervenor-Defendants House Permanent Select Committee on Intelligence and House Financial Services Committee (and their successors in office, officers, agents, servants, employees, attorneys, and anyone acting in concert with them) are enjoined from taking any adverse action against the Banks for not complying with the challenged subpoenas, or taking any other action to enforce the subpoenas.

Dated: _____, 2019

United States District Judge